

EXHIBIT B

RE: Timely - Requests to Modify Stipulation and for Leave to Amend Complaint (Atkins and Rusfeldt)

Brian Conley <bconley@macmainlaw.com>

Fri 4/26/2024 4:31 PM

To: William Mulgrew <william@cornerstonelaw.us>

Cc: Joel A. Ready, Esq. <joel@cornerstonelaw.us>; Aubrey Hanrahan <ahanrahan@macmainlaw.com>; Maeve Bain <mbain@macmainlaw.com>; David MacMain <DMacMain@macmainlaw.com>; Jessalyn Lemmons <jlemmons@macmainlaw.com>

William:

This correspondence serves as the responses of Defendants City of Reading and Officer Morar to Mr. Ready's letter of April 24, 2024.

Request in Section I to amend the confidentiality stipulation: The request is unnecessary. Paragraph 10 answers any concerns you may have.

Requests in Section II: Defendants do not consent.

Requests in Section III: Defendants do not consent. Defendants object to the filing of the proposed Amended Complaint in its entirety.

Best,

Brian C. Conley
Attorney



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From: William Mulgrew <william@cornerstonelaw.us>

Sent: Wednesday, April 24, 2024 4:51 PM

To: Brian Conley <bconley@macmainlaw.com>

Cc: Joel A. Ready, Esq. <joel@cornerstonelaw.us>; Aubrey Hanrahan <ahanrahan@macmainlaw.com>

Subject: Timely - Requests to Modify Stipulation and for Leave to Amend Complaint

Attorney Conley,

Kindly receive the attached letter from Attorney Joel Ready on behalf of Aden Rusfeldt and Damon Atkins, together with a proposed Amended Complaint (Clean copy and Markup copy) for the Rusfeldt case. Joel asks for a response before the close of business this Friday, April 26.

Have a nice day!

Very truly yours,

William Mulgrew
Legal Assistant



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